

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

TAMMY GATTE, individually and as : CIVIL ACTION NO. _____
representative of the estate of her
deceased spouse, Phillip Gatte, and as
Natural Tutrix of her minor child,
Evan Gatte and COLBY GATTE

Plaintiffs

versus :

READY FOR A CHANGE, LLC, : JUDGE _____
JUDY DOHM, DR. RAFAEL VELASCO
MARIN, DR. EZEQUIEL GAMEZ
HINOJOSA, DR. HECTOR JOAQUIN : MAGISTRATE JUDGE _____
PEREZ CORZO, GUILLERMINA GAMEZ,
and CLINICA VICTORIA HOSPITAL

Defendants

CERTIFICATE

TO THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA:

I, Joseph R. Pousson, Jr., counsel for defendants, **Ready 4 A Change, LLC** and **Judy Dohm**, do hereby certify that the following constitutes the entire State Court record of *"Tammy Gatte, individually and as representative of the estate of her deceased spouse, Phillip Gatte, and as Natural Tutrix of her minor child, Evan Gatte, and Colby Gatte v. Ready For A Change, LLC, Judy Dohm, Dr. Rafael Velasco Marin, Dr. Ezequiel Gamez Hinojosa, Dr. Hector Joaquin Perez Corzo, Guillermina Gamez, and Clinica Victoria Hospital,"* bearing Docket No. 2012-000934, Div. H:



- (1) Cover Sheet for Suit No. 2012-000934 filed on March 18, 2012;
- (2) Petition for Damages filed by plaintiffs on March 18, 2012;
- (3) Verification of J. Lee Hoffoss filed March 8, 2012;
- (4) Request for Notice filed by plaintiffs on March 8, 2011;
- (5) Service Instructions submitted by plaintiffs on March 8, 2011;
- (6) Request for Service Abroad upon Guillermina Gamez, filed by plaintiffs on March 8, 2011;
- (7) Request for Service Abroad upon Dr. Hector Joaquin Perez Corzo, filed by plaintiffs on March 8, 2011;
- (8) Request for Service Abroad upon Dr. Ezequiel Gamez Hinojosa, filed by plaintiffs on March 8, 2011;
- (9) Request for Service Abroad upon Dr. Rafael Velasco Marin, filed by plaintiffs on March 8, 2011;
- (10) Request for Service Abroad upon Clinica Victoria Hospital, filed by plaintiffs on March 8, 2011;
- (11) Cost Letter issued to plaintiffs' counsel on March 8, 2012;
- (12) Citation issued to Ready 4 A Change, LLC on March 23, 2012;
- (13) Citation issued to Judy Dohm on March 23, 2012;
- (14) Citation issued to Dr. Rafael Velasco Marin on March 23, 2012;
- (15) Citation issued to Dr. Hector Joaquin Perez Corzo on March 23, 2012;
- (16) Citation issued to Dr. Ezequiel Gamez Hinojosa on March 23, 2012;
- (17) Citation issued to Guillermina Gamez on March 23, 2012;
- (18) Citation issued to Clinica Victoria Hospital on March 23, 2012;
- (19) Affidavit of Long-Arm Service upon Judy Dohm, filed by plaintiffs on April 9, 2012;

- (20) Affidavit of Long-Arm Service upon Ready 4 A Change, filed by plaintiffs on April 9, 2012; and,
- (21) First Amended Petition for Damages, filed by plaintiffs on April 19, 2012.

Respectfully submitted:

s/ **Joseph R. Pousson, Jr.** - Bar No. 22598

Michael J. Williamson - Bar # 31004

Kendrick J. Guidry - Bar # 26908

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Attorneys for ***Ready For A Change, LLC***
and Judy Dohm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing **Notice of Removal** was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent by via email and U.S. Mail to the following counsel of record:

J. Lee Hoffoss, Jr.
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Lake Charles, Louisiana, this 24th day of April, 2012.

Respectfully submitted:

s/ **Joseph R. Pousson, Jr.** - Bar No. 22598

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and Judy Dohm